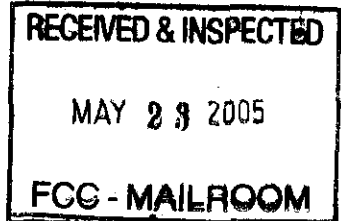


Before the
FEDERAL COMMUNICATION COMMISSION
Washington, D.C. 20554



In the Matter of)	
)	
Request for Review by Academia)	
San Jorge)	Form 471 Application No. 421080
Decision of the Universal Service)	
Administrator)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	
)	

TO: Wireline Competition Bureau

REQUEST FOR REVIEW

Pursuant to Sections 54.719(c) and 54.721 of the Federal Communications Commission ("Commission" or "FCC") rules, 47 C.F.R. §§ 54.719(c) and 54.721 (2003), Academia San Jorge hereby appeals the decision of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company to reduce the requested discount in Funding Year 2004 (07/01/2004 – 06/30/2005) from 80% to 20%.

I. BACKGROUND

On February 4, 2004, Academia San Jorge filed a FCC Form 471 with the SLD indicating the services for which it was requesting discounts under the schools and libraries universal service support mechanism (the "E-rate program").¹ On Block 4 of its 471 application, Academia San Jorge indicated that 198 out of 327 students enrolled during the 2004-2005 academic year qualified for a free or reduced price lunch under the National School Lunch Program ("NSLP") and requested an 80% discount on all of its funding requests.² During its

¹ FCC Form 471 No. 421080, Academia San Jorge (Exhibit A).

² The specific funding requests number are 1160576

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List ABCDE

review of Academia San Jorge's application, the SLD requested documentation supporting the eligible discount rate for the school.³ Specifically, the information request, which was delivered to Academia San Jorge, requested the following information:

1. The total number of enrolled.
2. Total number of surveys/applications sent out
3. Number of survey/application returned
4. Total number of students that qualifies for the National School Lunch Program, using the Income Eligibility Guidelines (IEG) of the NSLP, per returned surveys/applications
5. Are the surveys/applications and results kept on file.
6. Provide a sample copy of the FILLED OUT SURVEY/APPLICATION with the child's personal information crossed out for confidentiality.
7. A signed certification that reads: "I certify that only those students who meet the Income Eligibility of the National School Lunch Program have been included in Column 5 of item 10b, Block 4 (Worksheet A) of the Form 471."
8. The information must be in writing on the school letterhead and signed by a school official (such as the Principal, Vice – Principal Superintendent, Director of Food Services.

On December 19, 2004 Academia San Jorge provided the information requested to the SLD on the school letterhead and signed by the school Director, Vanesa V. Valdes.⁴ In its response, Academia San Jorge indicated that there were 646 students enrolled, that 646 surveys/applications were sent out and that 327 surveys/applications were returned. It also indicates from those 327 survey/applications returned 198 students qualifies for the NSLP, that the surveys/applications and its results are kept on file and certified that only the students who meet the IEG of the NSLP had being included in Column 5 item 10b of block 4 (worksheet A) of the Form 471. Academia San Jorge also provided a sample copy of the socio-economic survey⁵.

³ See letter from Zoilo A. Magpile, Schools and Libraries Division, Program Integrity Assurance, to Madeline Melgen, dated December 13, 2004 (Exhibit B).

⁴ See Letter from Academia San Jorge's Director, Vanesa V. Valdes to Schools and Libraries Division, Program Integrity Assurance, dated December 14, 2004 (Exhibit C).

⁵ See ESTUDIO SOCIOECONOMICO (Exhibit D)

On March 24, 2005, the SLD issued a funding commitment decision letter reducing the discount rate from 80% to 20%.⁶ The SLD provided no explanation on the reason for the percentage reduction.

It is our assumption that the SLD established the basis for the decision of awarding a 20% discount versus the 80% originally requested on the conflicting information provided by Academia San Jorge in the submitted SLD Form 471 and the response to the PIA request for information. **Academia San Jorge erred in filing the SLD Form 471 with inaccurate information on Block 4 column 4 (327)**⁷. This number is not consistent with the information provided in the applicant response to the request of information. (Exhibit D and Exhibit E) **Exhibit E provides the correct information (numbers) to calculate, following the FCC rules and procedures the exact number of students for Block 4, Column 4 (646).**

The survey, which had been provided to the SLD during the PIA review process, asked parents to provide the size of the family, the number of students enrolled in the school, and the household income. Out of the 646 surveys distributed, 327 of the students completed the survey. From the 327 completed surveys, 198 (60.55 %) were determined to be eligible for a free or reduced price lunch under the NSLP in accordance with the Income Eligibility Guidelines of the U.S. Department of Agriculture. Following the SLD's guidelines we can get to the conclusion that in Academia San Jorge 391 students, or 60.52 % of its student population, qualified for a free or reduced-price lunch under the NSLP. Using the discount matrix set forth in the FCC rules, a school with 60.55 % of its student population eligible for the national school lunch

⁶ See Letter from Schools and Libraries Division, Universal Service Administrative Company to Colegio Academia San Jorge, dated March 24, 2005 (Exhibit E)

⁷ Exhibit A

program qualifies for 80% discount under the schools and libraries universal service support mechanism.

II. ACADEMIA SAN JORGE CORRECTLY DETERMINED THE PERCENTAGE OF STUDENTS ELIGIBLE FOR A FREE OR REDUCED-PRICE LUNCH UNDER THE NSLP.

Although Academia San Jorge erroneously filed an SLD Form 471 with inaccurate information on Block 4, alternately, when requested submitted sufficient evidence to the PIA to demonstrate the percentage of students eligible for a free or reduced – price lunch under the NSLP. (80%)

Under the Commission's rules, the discount available to a particular school is determined by indicators of poverty and high relative cost of service.⁸ First, the level of poverty for schools is measured by the percentage of their student enrollment that is eligible for a free or reduced-price lunch under the NSLP or a federally-approved alternative mechanism outlined in Title I of the Improving America's School Act (IASA).⁹ These federally-approved alternative mechanisms include data comparable to the NSLP data that is collected through surveys. As the Commission has acknowledged, surveys are particularly relevant to schools that many not have access to NSLP data, such as private schools.¹⁰ Second, a school's high-cost status is derived from rules that classify it as urban or rural.¹¹ The Commission's rules provide a matrix reflecting

⁸ 47 C.F.R. § 54.505(b).

⁹ 47 C.F.R. § 54.505(b)(1); *Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, FCC 97-157, 12 FCC Rcd 8776, ¶¶ 508-09 (rel. May 8, 1997).

¹⁰ *See* School for Language and Communication Development, Order, 17 FCC Rcd 15166 (rel. Aug. 6, 2002).

¹¹ 47 C.F.R. §§ 54.505(b)(3)(i), (ii).

both the school's urban or rural status and the percentage of its students who are eligible for the school lunch program to establish its discount rate, ranging from 20 percent to 90 percent.¹²

Because NSLP data is unavailable for Academia San Jorge, it used a federally-approved alternative mechanism that relies on actual counts of low-income children to determine the level of poverty.

III. THE SLD ERRONEOUSLY CONCLUDED THAT ACADEMIA SAN JORGE QUALIFIED FOR A 20% DISCOUNT AND FAILED IN NOT REQUESTING ADDITIONAL INFORMATION TO THE SCHOOL AND CLARIFY THE CONFLICTING INFORMATION.

Academia San Jorge submitted to the SLD exactly what it was asked to submit: (a) the total number of students (646 students), (b) the number of surveys/applications sent out (646), (c) the number of surveys/applications returned (327) (d) the number of students qualified to participate in the NSLP, 198 (based on the SLD projection guidelines), (e) if the survey/applications were kept on file, yes, (f) and (g) certification that only students that meet the IEG of the NSLP have been included in Column 5, item 10b of block 4 (worksheet A) of the Form 471. In addition, Academia San Jorge provided a sample copy of the socio-economic survey conducted by the school. No additional documentation supporting the eligible discount rate for the school was requested.

IV. CONCLUSION

Academia San Jorge provided clear evidence to the SLD that it qualified for an 80% discount under the E-rate program since 391 out of 646 students (60.52% of the student population) were eligible for a free or reduced price lunch under the NSLP. This data was collected through a survey that was conducted in accordance with the SLD's guidelines.

¹² 47 C.F.R. § 54.505(c).

Furthermore, the school provided the SLD with all the information that was requested during the application review process. Therefore, the SLD erred in its decision to reduce the discount rate from the requested 80% to 20% and in not granting an 80% discount to Academia San Jorge. Therefore, Academia San Jorge respectfully requests that the Commission reverse the SLD's reduction of discount rate and grant this application to be funded at a 80% discount.

Respectfully submitted,

ACADEMIA SAN JORGE

/s/ *Vanesa V. Valdes*

Vanesa V. Valdes
Director, Academia San Jorge
1701 Colon Street
San Juan, PR 00911-2074
Tel: 787-722-3182
Fax: 787-725-4580

May 16, 2005

HELP

FCC Form 471

Services Ordered and Certification Form



Applicant's Form Identifier: TEL200318

Entity Number: 200318

Contact Person: Madeline Melgen Ed D Phone Number: (787) 731-6100 Ext. 234

Please record this application's information in a secure place for future reference

471 Application Number: 407533

Entity Number of Billed Entity (Applicant): 200318

Security Code Number: 95473

Continue >>

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**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

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Block 1: Billed Entity Information

Applicant's Form Identifier:

TEL200318

471 Application Number:

407533

Funding Year: 07/01/2004 -

06/30/2005

Billed Entity Number:

200318

Cert. Postmark Date:

Form Status: INCOMPLETE

RAL Date:

Out of Window Letter Date:

Name: ACADEMIA SAN JORGE

Address: 1701 COLON ST.

City: SAN JUAN **State:** PR **Zip:** 00911 2074

Phone: 787-722-3182 **Ext:**

Fax: --

E-mail:

Contact Name: Madeline Melgen Ed D

Address: Road 177 Building 2021, Camino Alejandrino

City: Guaynabo **State:** PR **Zip:** 00969 5140

Contact Phone: 787-731-6100 **Ext:** 234

Contact Fax: 787-731-0000 **Ext:**

E-mail: mmelgen@escuelascatolicas-sj.org

Contact Mode: FAX

Alternate Contact Info.:

Type of Application: SCHOOL

Ineligible Orgs: N

Block 3: Impact of Services Ordered in THIS Application

Number of students to be served: 646

Number of library patrons to be served:

SERVICE DESCRIPTION	BEFORE ORDER	AFTER ORDER
a. (Schools/districts/consortia only) Telephone service: How many classrooms had phone service before and after your order?	24	24
b. High-bandwidth voice/data/video service: How many buildings served before and after your order?	1	1
c. High-bandwidth voice/data/video service: Highest speed to a building before and after your order?	256	512
d. Dial-up Internet connections: How many before and after your order?	1	1
e. Dial-up Internet connections: Highest speed before and after your order?	28	56
f. Direct connections to the Internet: How many before and after your order?	1	1
g. Direct connections to the Internet: Highest speed before and after your order?	256	512
h. Internet access(for schools): How many rooms have Internet access before and after your order?	10	84
i. Internet Access: How many computers (or other devices) with Internet access before and after your order?	17	40

Block 4: Worksheets

Worksheet A No: 589657 **Student Count:** 327

Weighted Product (Sum. Column 8): 261.6

Shared Discount: N/A

1. School Name: ACADEMIA SAN JORGE

2. Entity Number:
200318

3. Rural/Urban: Urban

4. Student Count:
327

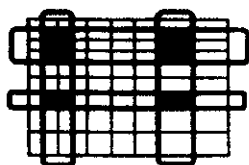
5. NSLP Students:
198

6. NSLP Students/Students: 60.550%

7. Discount: 80%

8. Weighted Product: 261.6

Block 5: Discount Funding Request(s)



NEVESEM, INC.

MSC 608, 138 Ave. Winston Churchill, San Juan, P.R. 00926-6023 Tel.787-706-2700

Date: December 18, 2003
 Name: Academia San Jorge
 Santurce, PR
 Entity #: 200318
 Application #: _____

Year 2004 Quote Item 21 Attachment

Internal Connections

Quantity	Description	Amount per Product	Total per year per school
2	Switch		\$ 5,240
2	Cisco 2950	4,680	
	10/100 Base T managed Switch / 24 ports/ Autosensing		
	1 yr on site warranty		
	Design & Documentation	160	
2	Installation	400	
	Rack Cabinet		\$ 5,904
2	EIA 24 x 24 x 24 inch standard	1,220	
2	24 ports Patch Panel	356	
2	Smart 500 VA/300w/120 vac true sinewave UPS 2u-3yrs on site warranty	1,000	
2	Installation	1,020	
	Certification & Documentation	408	
10	Horizontal Cabling (Drops - Cat 5e) Installed	1,900	
	Backbone Fiber Cabling		\$ 7,240
12	Multimode sc connector ceramic	102	
2	FDC 24 Port Rack Mount Fiber	361	
2	Plate 6 copler sc ceramic patch panel accessories	190	
2	Fiber to UTP Converter 10/100 sc 850 NM MM converter	940	
1	Fiber Optic cabling 1000	1,500	
	Certification & Documentation	691	
1	Installation	3,456	
	Existing Equipment Maintenance (Yearly)		\$ 6,580
	Hardware	4,060	
1	IBM Firewall Server	1,760	
1	Cube Server	1,760	
1	Cisco Router	540	
	Operating Software	2,520	
1	IBM Firewall Server	1,260	
1	Cube Server	1,260	
1	Project Management		\$ 1,089
Total			\$ 26,053

FRN: 1159833		FCDL Date:	
11. Category of Service: Internal Connections		12. 470 Application Number: 114490000470468	
13. SPIN: 143022659		14. Service Provider Name: A New Vision in Educational Services and Materials (NEVESEM)	
15. Contract Number: ONE TIME		16. Billing Account Number: 200318	
17. Allowable Contract Date: 01/01/2004		18. Contract Award Date: 01/22/2004	
19a. Service Start Date: 07/01/2004		19b. Service End Date:	
20. Contract Expiration Date: 08/30/2005			
21. Attachment #: 3		22. Block 4 Entity Number: 200318	
23a. Monthly Charges: \$.00		23b. Ineligible monthly amt.: \$.00	
23c. Eligible monthly amt.: \$0.00		23d. Number of months of service: 12	
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$0.00			
23f. Annual non-recurring (one-time) charges: \$26,053.00		23g. Ineligible non-recurring amt.: \$.00	
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$26,053.00			
23i. Total program year pre-discount amount (23e + 23h): \$26,053.00			
23j. % discount (from Block 4): 80			
23k. Funding Commitment Request (23i x 23j): \$20,842.40			

Block 6: Certifications and Signature

24a. Schools: Y
 24b. Libraries or Library Consortia: N

 26a. Individual Technology Plan: N
 26b. Higher-Level Technology Plan(s): Y
 26c. No Technology Plan Needed:

 27a. Approved Technology Plan(s): Y
 27b. State Approved Technology Plan: N
 27c. No Technology Plan Needed:

36. Printed Name of Authorized Person: VANESA VALDES

37. Title or Position of Authorized Person: DIRECTOR

38a. Address: CALLE COLON 1701

ESQ SAN JORGE

City: SAN JUAN State: PR Zip: 00911

38b. Telephone Number of Authorized Person: (787) 722-3182 ext.

38c. Fax Number of Authorized Person: (787) 725 - 4580

38d. Email address of Authorized Person:

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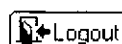
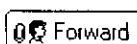
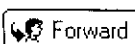
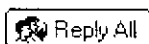
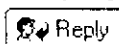
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EXHIBIT B

Message Display

Inbox

137 messages





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Move


Date: Mon, 13 Dec 2004 15:45:25 -0500

All headers

From: "PIATeam7" <PIATeam7@sl.universalservice.org>  

To: "MarieGlorie Zapata/Madeline Melgen@17877310000" <IMCEAFAX-MarieGlorie+20Zapa>

CC: <mzapata@escuelascaticas-sj.org>, <mmelgen@escuelascaticas-sj.org>

Subject: Application#421080 - Academia San Jorge 

All attachments

December 13, 2004

Madeline Melgen/Marieglorie Zapata**ACADEMIA SAN JORGE**

Contact Phone Number (787) 7316100

Application Number : **421080**

Dear Ms. Melgen / Ms. Zapata.

The Program Integrity Assurance (PIA) team is in the process of reviewing all Form 471 Applications for schools and libraries discounts to ensure that they are in compliance with the rules of the federal universal service program. We are currently in the process of reviewing your Funding Year 2004 Form 471 Application. To complete our review, we need some additional information. The information needed to complete the review is listed below.

Based upon review of your Form 471 application, we were not able to validate your requested discount percentage of 80% for *Academia San Jorge*. If you choose to validate your original requested discount percentage of 80%, then please provide the appropriate documentation if one of the following acceptable methods were used:

- a. If the school participates in a National School Lunch Program (NSLP), please provide us a signed copy (preferably by the Principal, Vice-Principal, Superintendent, or Director of Food Services) of the Reimbursement Claim Form that the school sends to the state each month. Make sure that the following 3 items are identified:

- 1) The Entity name

- 2) The total number of students enrolled at the entity
- 3) The total number of students eligible for Free/Reduced Lunch Program for the entity

If the school district fills out an aggregate form for the school district, provide a signed letter from a school official (preferably the Superintendent) that lists the Free/Reduced information for each school in the district.

- h. If the discount percentage was determined by information obtained from a survey/application, please provide the following information:
 - 1) Total number of students enrolled
 - 2) Total number of surveys/applications sent out
 - 3) Number of surveys/applications returned
 - 4) Total number of students qualified for NSLP per the returned surveys/applications
 - 5) Are the surveys/applications and results kept on file.
 - 6) Provide a sample copy of a FILLED OUT SURVEY/APPLICATION with the child's personal information crossed out for confidentiality.
 - 7) A signed certification that reads: "I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 10b, of Block 4 (Worksheet A) of the Form 471."
 - 8) This information must be in writing on school letterhead and signed by a school official (such as the Principal, Vice-Principal, Superintendent, Director of Food Services).
- c. If the discount was determined using a different method than what was identified above, please indicate the method that was used and provide all relevant data.

Please fax or e-mail the requested information to my attention. If you have any questions, please feel free to contact me.

It is important that we receive all of the information requested so we can complete our review. **Failure to do so may result in a reduction or denial of funding.**

Please send the requested information within 3 calendar days. If you need additional time to prepare your response, please let me know as soon as possible.

Thank you for cooperation and continued support of the Universal Service Program.

Sincerely,

Zoilo A. Magpile

PIA – Team 7

Schools And Libraries Division

Program Integrity Assurance

Phone: 1-973-560-4489

FAX: 1-973-599-6578

e-mail address : zmagpil@sl.universalservice.org



Open WebMail version 1.53



ACADEMIA SAN JORGE

1701 Colón Street

EXHIBIT C

December 14, 2004

Schools and Libraries Division
Program Integrity Assurance

Academia San Jorge wants to certify the following information:

- | | |
|--|-----|
| 1. Total number of students enrolled | 646 |
| 2. Number of surveys/applications sent out | 646 |
| 3. Number of surveys/applications returned | 327 |
| 4. Total number of students qualified for NSLP
(As per the returned surveys/applications) | 198 |
| 5. Are the surveys/applications and the results kept on file | YES |

"I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 item 10b

Enclosed is a copy of the survey applied.

Cordially,

A handwritten signature in cursive script, appearing to read "Vanesa Valdes".

Vanesa Valdes
Director

mza

Date 12/30/04 # of pages 2	From V. Vaede
To M.G. Zepeda	Co.
Co./Dept.	Phone #
Phone #	Fax #
Fax # 721-0000	

EXHIBIT D

Superintendencia de Escuelas Católicas
Arquidiócesis de San Juan
Guaynabo, Puerto Rico

ESTUDIO SOCIO-ECONOMICO

Academia San Jorge

Año escolar 2003-2004

- Nombre del estudiante _____ Grado 10
- Nombre del padre o encargado _____
Ingreso anual 29,120
- Nombre de la madre _____
Ingreso anual 29,120
- Total de ingreso anual familiar _____
- Total de miembros de la familia 5
Ceraño correcto _____
Firma del padre o encargado _____

Señale en la siguiente tabla la cantidad total de miembros de su familia y su ingreso bruto anual.

Family Size	Income Per Week	Income Per Month	Income Per Year
1	\$231	\$1,217	\$14,597
2	\$378	\$1,938	\$19,839
3	\$475	\$2,058	\$24,681
4	\$572	\$2,473	\$29,695
<u>5</u>	\$668	\$2,894	\$34,728
6	\$765	\$3,314	\$39,752
7	\$862	\$3,733	\$44,789
8	\$959	\$4,152	\$49,821

¿Su ingreso anual es igual o menor a la cantidad reflejada en la tabla con relación al número total de miembros en su familia? SI NO

¿Reciben usted o algún miembro de su familia uno o más de los siguientes servicios?

- | | | | |
|------------------------------|---|------------------------|---|
| Medicina | ✓ | Quemones de alimentos | ✓ |
| Asistencia económica | ✓ | Bebé/mamá | ✓ |
| Beneficios sociales | ✓ | Asistencia alimentaria | ✓ |
| Seguro social por maternidad | ✓ | Asistencia económica | ✓ |



Universal Service Administrative Company
Schools & Libraries Division

FUNDING COMMITMENT DECISION LETTER

(Funding Year 2004: 07/01/2004 - 06/30/2005)

March 24, 2005

Madeline Melgen Ed D
ACADEMIA SAN JORGE
Road 177 Building 2021
Camino Alejandrino
Guaynabo, PR 00969-5140

Re: Form 471 Application Number: 407533
Funding Year 2004: 07/01/2004 - 06/30/2005
Billed Entity Number: 200318
Applicant's Form Identifier: TEL200318

Thank you for your Funding Year 2004 E-rate application and for any assistance you provided throughout our review. Here is the current status of the funding request(s) featured in the Funding Commitment Report at the end of this letter.

- The amount, \$5,210.60 is "As Yet Unfunded."

Please refer to the Funding Commitment Report on the page following this letter for specific funding request decisions and explanations.

The Important Reminders and Deadlines immediately preceding this letter are provided to assist you throughout the application process.

NEXT STEPS

- Review technology planning approval requirements
- Review CIPA Requirements
- File Form 486
- Invoice the SLD using the Form 474 (service providers) or Form 472 (Billed Entity)

FUNDING COMMITMENT REPORT

On the pages following this letter, we have provided a Funding Commitment Report for the Form 471 application cited above. The enclosed report includes a list of the Funding Request Number(s) (FRNs) from your application. The SLD is also sending this information to your service provider(s) so preparations can be made to begin implementing your E-rate discount(s) after you file your Form 486. Immediately preceding the Funding Commitment Report, you will find a guide that provides a definition for each line of the Report.

TO APPEAL THIS DECISION:

If you wish to appeal the decision indicated in this letter, your appeal must be received by the SLD or postmarked withing 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and e-mail address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify which Funding Commitment Decision(s) you are appealing. Indicate the relevant funding year and the date

of the ECDL. Your letter of appeal must also include the Billed Entity Name, the Form 471 Application Number, and the Billed Entity Number from the top of your letter.

3. When explaining your appeal, copy the language or text from the Funding Commitment Report that is at the heart of your appeal, to allow the SLD to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep copies of your correspondence and documentation.
4. Provide an authorized signature on your letter of appeal.

If you are submitting your appeal on paper, please send your appeal to: Letter of Appeal, Schools and Libraries Division, Box 125 - Correspondence Unit, 80 South Jefferson Road, Whippany, NJ 07981. Additional options for filing an appeal can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We encourage the use of either the e-mail or fax filing options.

While we encourage you to resolve your appeal with the SLD first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, sent to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We strongly recommend that you use either the e-mail or fax filing options.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Universal Service Support Mechanism. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. The SLD may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by the SLD, the applicant, or the service provider. The SLD, and other appropriate authorities (including but not limited to USAC and the FCC), may pursue enforcement actions and other means of recourse to collect erroneously disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division
Universal Service Administrative Company

A GUIDE TO THE FUNDING COMMITMENT REPORT

A report for each E-rate funding request from your application is attached to this letter. We are providing the following definitions for the items in that report.

FORM 471 APPLICATION NUMBER: The unique identifier assigned to a Form 471 application by the SLD.

FUNDING REQUEST NUMBER (FRN): A Funding Request Number is assigned by the SLD to each Block 5 of your Form 471 once an application has been processed. This number is used to report to applicants and service providers the status of individual funding requests submitted on a Form 471.

FUNDING STATUS: Each FRN will have one of the following definitions:

1. An FRN that is "Funded" is approved at the level that the SLD determined is appropriate for this FRN. The funding level will generally be the level requested unless the SLD determines during the application review process that some adjustment is appropriate.
2. An FRN that is "Not Funded" is one for which no funds were committed. The reason for the decision will be briefly explained in the "Funding Commitment Decision Explanation." An FRN may be "Not Funded" because the request does not comply with program rules, or because the total amount of funding available for this Funding Year was insufficient to fund all requests.
3. An FRN that is "As Yet Unfunded" reflects a temporary status that is assigned to an FRN when the SLD is uncertain at the time the letter is generated whether there will be sufficient funds to make commitments for requests for Internal Connections at a particular discount level. For example, if your application included requests for discounts on both Telecommunications Services and Internal Connections, you might receive a letter with funding commitments for your Telecommunications Services funding requests and a message that your Internal Connections requests are "As Yet Unfunded." You would receive one or more subsequent letters regarding the funding decision on your Internal Connections requests.

SERVICES ORDERED: The type of service ordered from the service provider, as shown on your Form 471.

SPIN (Service Provider Identification Number): A unique number assigned by the Universal Service Administrative Company to service providers seeking payment from the Universal Service Fund for participating in the universal service support mechanisms. A SPIN is also used to verify delivery of services and to arrange for payment.

SERVICE PROVIDER NAME: The legal name of the service provider.

CONTRACT NUMBER: The number of the contract between the eligible party and the service provider. This will be present only if a contract number was provided on your Form 471.

BILLING ACCOUNT NUMBER: The account number that your service provider has established with you for billing purposes. This will be present only if a Billing Account Number was provided on your Form 471.

SERVICE START DATE: The date services were reported to start for this FRN on your Form 471.

CONTRACT EXPIRATION DATE: The date the contract expires. This will be present only if a contract expiration date was provided on your Form 471.

SITE IDENTIFIER: The Entity Number listed in Form 471, Block 5, Item 22a. This will be present only for "site specific" FRNs.

ANNUAL PRE-DISCOUNT AMOUNT FOR ELIGIBLE RECURRING CHARGES: Eligible monthly pre-discount amount approved for recurring charges multiplied by number of months of recurring service approved for the funding year.

ANNUAL PRE-DISCOUNT AMOUNT FOR ELIGIBLE NON-RECURRING CHARGES: Annual eligible non-recurring charges approved for the funding year.

PRE-DISCOUNT AMOUNT: Amount in Form 471, Block 5, Item 23I, as determined through the application review process.

DISCOUNT PERCENTAGE APPROVED BY THE SLD: The discount rate that the SLD has approved for this service.

FUNDING COMMITMENT DECISION: This represents the total amount of funding that the SLD has reserved to reimburse your service provider for the approved discounts for this service for this funding year. It is important that you and your service provider both recognize that the SLD should be invoiced and the SLD may direct disbursement of discounts only for eligible, approved services actually rendered.

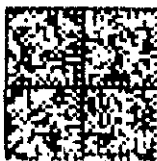
FUNDING COMMITMENT DECISION EXPLANATION: This entry provides an explanation of the amount in the "Funding Commitment Decision."

FUNDING COMMITMENT REPORT

Form 471 Application Number: 407533
Funding Request Number: 1159833 Funding Status: As Yet Unfunded
Services Ordered: Internal Connections
SPIN: 143022659 Service Provider Name: A New Vision in Educational Se
Contract Number: ONE TIME
Billing Account Number: 200318
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 200318
Annual Pre-discount Amount for Eligible Recurring Charges:
Annual Pre-discount Amount for Eligible Non-recurring Charges:
Pre-discount Amount:
Discount Percentage Approved by the SLD:
Funding Commitment Decision:

USAC

Schools and Libraries Division
Box 125 - Correspondence Unit
80 South Jefferson Road
Whippany, New Jersey 07981



TIME SENSITIVE MATERIAL

00242
Madeline Melgen Ed D
ACADEMIA SAN JORGE
Road 177 Building 2021
Camino Alejandrino
Guaynabo, PR 00969-5140



IMPORTANT REMINDERS & DEADLINES

Date: March 24, 2005
471 : 407533
BEN : 200318

The following information is provided to assist you throughout the application process. We recommend that you keep it in an easily accessible location and that you share it with the appropriate members of your organization.

FORM 486 DEADLINE - The Form 486 must be postmarked no later than 120 days after the Service Start Date you report on the Form 486 or no later than 120 days after the date of the Funding Commitment Decision Letter, whichever is later. If you are required to have a Technology Plan, that plan must be approved by the start of service for this funding year, you must indicate the SLD Certified Technology Approver who approved your plan and you must retain your approval letter and documentation of your monitoring of the progress toward your stated goals.

CHILDREN'S INTERNET PROTECTION ACT (CIPA) - You must be in compliance with CIPA and cannot request a waiver, if FY2004 is your Third Funding Year for the purposes of CIPA.

INVOICE DEADLINE - Invoices must be postmarked no later than 120 days after the last date to receive service - including extensions - or 120 days after the date of the Form 486 Notification Letter, whichever is later. Invoices should not be submitted until the invoiced products and services have been delivered and billed, and (for BEAR Forms) the provider has been paid.

OBLIGATION TO PAY NON-DISCOUNT PORTION - Applicants are required to pay the non-discount portion of the cost of the products and/or services. Service providers are required to bill applicants for the non-discount portion. The FCC has stated that requiring applicants to pay their share ensures efficiency and accountability in the program. If you are using a trade-in as part of your non-discount portion, please refer to the SLD web site.

RETAIN DOCUMENTATION - Applicants must retain documentation, including but not limited to, documents showing:

- compliance with all applicable competitive bidding requirements,
- products and/or services delivered (e.g., customer bills detailing make, model and serial number),
- resources necessary to make effective use of E-rate discounts, including the purchase of equipment such as workstations not eligible for support,
- the specific location of each item of E-rate funded equipment, and
- the applicant has paid the non-discount portion.

These documents must be retained and available for review for 5 years.

SUSPENSION AND DEBARMENT - Persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the Schools and Libraries Support Mechanism are subject to suspension and debarment from the program.

FREE SERVICES ADVISORY - Applicants and service providers are prohibited from using the Schools and Libraries Support Mechanism to subsidize the procurement of ineligible or unrequested products and services, or from participating in arrangements that have the effect of providing a discount level to applicants greater than that to which applicants are entitled.

Complete program information - including more information on these reminders - is posted to the Schools and Libraries Division (SLD) web site at www.sl.universalservice.org. You may also contact the SLD Client Service Bureau by e-mail using the "Submit a Question" link on the SLD web site, by fax at 1-888-276-8736 or by phone at 1-888-203-8100.